

Tennessee Democratic Victory 2000



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June 25, 2001

Mr. Donald L. Averett
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Tennessee Democratic Victory 2000 -- Federal Account
Identification No. C00359117
Amended 30 Day Post-General Report (10/19/00-11/27/00), dated 4/25/2001

Dear Mr. Averett:

I am writing in response to your letter of June 13, 2001 to J. Clark Jones, Treasurer of Tennessee Democratic Victory 2000 -- Federal Account ("TDV 2000"). Your letter raises several questions regarding TDV 2000's amended 30 Day Post-General Report. You have asked for a written response to these questions or that an amendment to our original report be filed with the Federal Election Commission. An itemization addressing your questions follows:

- The transfers from the Democratic National Committee ("DNC") reported on page 1 of 2 for Line 12 of Schedule A were received by TDV 2000 from the DNC. These funds were transferred from the federal account of the DNC and were intended as a contribution to the federal account of TDV 2000. An apparent clerical error by the DNC resulted in these transfers being reported as transfers to the Tennessee Democratic Party on the DNC's December 2000 30 Day Post-General Report. TDV 2000 has notified the DNC of this error and is working with it to ensure its correction.
- The expenditures for "GOTV Consulting Fee" disclosed on Schedule H4 of both the October 2000 Pre-General Election Report and the December 2000 Post-General Election Report were fees paid by TDV 2000 to individuals hired to assist TDV 2000 in the design and implementation of its "Get Out The Vote" ("GOTV") effort for the November 2000 general elections. These individuals provided services related to field organizing and voter turnout activities. This effort was structured as a generic GOTV operation, designed to identify and mobilize core Democratic voters in heavily Democratic geographical areas. Individuals hired as GOTV consultants were all Democratic activists with a thorough understanding of Democratic voters in their particular regions. They provided their time and expertise in identifying core

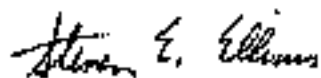
*Paid for by Tennessee Democratic Victory 2000. Clark Jones, Treasurer
Contributions to Tennessee Democratic Victory 2000 are not tax deductible for federal income tax purposes.*

Democratic voters and getting these voters to the polls. These individuals were hired to work on behalf of the entire Democratic ticket and not on behalf of any individual candidate. Therefore, these expenses were paid on the Administrative/Generic Voter Drive allocation ratio.

- The expenditures for "GOTV Contract Labor" disclosed on Schedule H4 of the Post-General Election Report were fees paid to individuals hired to assist TDV 2000 in its GOTV effort for the November 2000 general elections. These individuals provided services related to field organizing and voter turnout. This effort was structured as a generic GOTV operation, designed to identify and mobilize core Democratic voters in heavily Democratic geographical regions. Individuals hired as GOTV contract labor provided services such as coordinating voter transportation; driving voters to the polls (both during Tennessee's early voting period and on election day); staffing telephones at TDV 2000's voter transportation center; and distributing generic GOTV leaflets in heavily Democratic neighborhoods. These individuals were hired to work on behalf of the entire Democratic ticket and not on behalf of any individual candidate. Therefore, these expenses were paid on the Administrative/Generic Voter Drive allocation ratio.
- The expenditure for "Entertainment GOTV Rally" disclosed on Schedule H4 of the Post-General Election Report was a fee paid to a musician who performed at a small generic GOTV rally. This rally was structured as a generic event, designed to mobilize core Democratic voters to vote for the entire Democratic ticket.
- The expenditures for "Radio Air Time" disclosed on Schedule H4 of the Post-General Election Report were fees paid to purchase radio air time to allow TDV 2000 to air generic radio advertisements. The expenditure for "Radio Advertisement Editing" was a fee paid for editing services during the production of these radio advertisements. These radio advertisements were generic messages designed to mobilize base Democratic voters to vote in the November 2000 general election. The advertisements encouraged voters to vote Democratic and did not mention any specific candidate. These expenditures were not made on behalf of any specifically identified candidate.
- The expenditures for "Newspaper Advertisement" disclosed on Schedule H4 of the Post-General Election Report were fees paid to purchase space in several newspapers for a generic print advertisement. These expenditures were not made on behalf of any specifically identified candidate.
- Schedule H4 discloses expenditures for several exempt activities. Each of these exempt activities was carefully structured to comply with the conditions outlined in 11 CFR § 100.7(b). The transfers from the DNC disclosed on Schedule A were not made to specifically fund any exempt activity. These transfers were made to assist TDV 2000 in funding administrative and generic expenses. TDV 2000 segregated funds transferred from the DNC in order to ensure that these funds were not used to pay for any exempt activities.

I hope this letter answers your questions. Please feel free to contact me if I can provide further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steven E. Elkins". The signature is written in a cursive style with a large initial 'S'.


Steven E. Elkins
Assistant Treasurer

Enclosure

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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